

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

FILED AUG 13 2008

MICHAEL T. MASON

UNITED STATES OF AMERICA

MAGISTRATE JUDGE
No. 08 CR 645 UNITED STATES DISTRICT COURT

VS.

Magistrate Judge Michael T. Mason

KEVIN LAMAS, DENNIS ZAMBRANO and HUGH FERNANDO ZAMBRANO

GOVERNMENT'S MOTION TO SEAL ARREST WARRANTS

Now comes the UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, and states as follows in support of its Motion to Seal Arrest Warrants:

On 13th day of August, 2008, the government filed Arrest Warrants for the above-captioned defendants. The Warrants disclose the fact that defendants are charged by Complaint with bank larceny, in violation of Title 18, United States Code, Section 2113(b). Disclosing the warrants would jeopardize the government's ability to arrest the defendants, since they would likely flee if they knew they had been charged with a crime by Complaint.

For the foregoing reasons, the government respectfully requests that the Arrest Warrants, Motion to Seal and accompanying Order be sealed for 30 days from the date of this Order, until September 10, 2008, or until defendants appear in Court after the defendants' arrests.

Respectfully submitted, PATRICK J. FITZGERALD United States Attorney

By:

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DATE: August 13, 2008